

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ALAN TAVERAS,

Plaintiff,

-against-

**NOTICE OF
MOTION TO DISMISS**

20 CV 01200 (KPF)

NEW YORK CITY, New York, DERMOT SHEA, in his
official capacity as Police Commissioner, and all
successors therein, JONATHAN DAVID, in his official
capacity as Director, NYPD License Division, and ASIF
IQBAL, in his official capacity as Executive Director,
License Division Rifle/Shotgun Section,

Defendants.
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PLEASE TAKE NOTICE that upon the accompanying memorandum of law,
and upon the Amended Complaint (ECF Dkt. 13), defendants New York City (“City”), Dermot
Shea, in his official capacity as Police Commissioner, and all successors therein, Jonathan David,
in his official capacity as Director, NYPD License Division, and Asif Iqbal, License Division
Executive Officer¹, will move this Court before the Honorable Katherine Polk Failla, at the
United States Courthouse located at 40 Foley Square, New York, New York, for an order,

¹ Asif Iqbal’s title is incorrectly described in the caption as Executive Director of the License Division Rifle/Shotgun Section.

pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, dismissing the Amended Complaint and for such other and further relief as the Court may deem just and proper.

Dated: New York, New York
July 22, 2020

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